

EXHIBIT “2”

Bryson, Santana And Joshua Vs. Rough Country, LLC

Page 1

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF GEORGIA

GAINESVILLE DIVISION

SANTANA BRYSON AND JOSHUA BRYSON,)
AS ADMINISTRATORS OF THE ESTATE)
OF C.Z.B., AND AS SURVIVING)
PARENTS OF C.Z.B., A DECEASED)
MINOR,) CIVIL ACTION FILE NO.:
Plaintiffs,) 2:22-CV-17-RWS
v.)
ROUGH COUNTRY, LLC,)
Defendant.)

VIDEOTAPED VIDEOCONFERENCE

RULE 30(B)(6) DEPOSITION OF

RAD J. HUNSLEY

ON BEHALF OF

ROUGH COUNTRY, LLC

* NONCONFIDENTIAL PROCEEDINGS *

August 4, 2023

10:08 a.m.

Dyersburg, Tennessee

Jennifer B. Ourada, CCR

Certificate No. 2658

1 THE COURT REPORTER: Ms. Cannella?

2 MS. CANNELLA: Yes, ma'am.

3 THE COURT REPORTER: I'm sorry, can we go
4 off for one moment.

5 MS. CANNELLA: Yes, ma'am.

6 THE VIDEOGRAPHER: Off the record, 10:15.

7 (There was a break in the proceedings from
8 10:15 a.m. through 10:17 a.m.)

9 THE VIDEOGRAPHER: Back on the record.

10 The time is 10:17.

11 BY MS. CANNELLA:

12 Q All right. Mr. Hunsley, you said that
13 no -- that Rough Country has no evidence from
14 consumer feedback that its lift kits are causing an
15 issue with injury.

16 Is it Rough Country's testimony that it's
17 waiting for its consumers to tell it if people are
18 getting hurt in crashes because of the lift kit?
19 How would consumers know that?

20 A Well, we've never had any feedback from
21 any government agencies. What I mean by
22 "consumers," we've been putting our product in
23 commerce for 30 years. And with the millions of
24 kits and billions of miles of exposure of our
25 product on the road, we've never had any incidents.

1 designed to be safe in crashes?

2 MR. HILL: Object to the form. Go ahead.

3 BY THE WITNESS:

4 A The auto manufacturers that design these
5 vehicles go through extensive testing and analysis
6 to make sure that the vehicles are safe on the
7 roads --

8 BY MS. CANNELLA:

9 Q And the automakers -- oh, I'm sorry, I
10 didn't mean to interrupt you. Go ahead and finish.

11 A And then we go through extensive design of
12 our products to ensure that our lifts maintain the
13 OE performance.

14 Q Can you say that last part again? That
15 Rough Country goes through extensive what?

16 A We design our product to ensure the
17 performance of the OE vehicle is maintained, from a
18 suspension handling perspective.

19 Q Okay. We're going to get back to that,
20 both of those things.

21 But, first, isn't it true that if trucks
22 didn't get in crashes, they wouldn't need seat
23 belts. Correct?

24 MR. HILL: Object to form. Go ahead.

25

1 to necessarily all the documents in the Mendoza
2 case.

3 Q Has anyone told you about any crash
4 testing or computer-aided design testing?

5 A No, ma'am.

6 Q Okay. And did Rough Country call up the
7 manufacturer of that truck and say, hey, what
8 happens if we lift this truck? Is that dangerous?
9 Does that change the crash vehicle dynamics?

10 MR. HILL: Object to the form.

11 BY THE WITNESS:

12 A No. We didn't have any specific
13 communications with the OE manufacturer of the
14 truck. Again, we design our lift kits to maintain
15 performance -- handling performance characteristics
16 (indiscernible audio).

17 MS. CANNELLA: Can you guys hear
18 Mr. Hunsley okay? Yeah, I think you've got to
19 maybe speak up a little bit.

20 THE WITNESS: Okay. Sorry.

21 MS. CANNELLA: Okay. Thank you.

22 THE COURT REPORTER: I'm sorry, could you
23 repeat the answer because it was all broken up.

24 THE WITNESS: Please repeat the question.

25 MS. CANNELLA: Jennifer, could you give us

1 BY THE WITNESS:

2 A We've never hired anyone to directly test
3 our product. Again, we make products for 80-plus
4 different applications, and there's an infinite
5 number of vehicles that our product could be
6 involved with. Again, there's no structured test
7 that we're even aware of that could be conducted, as
8 you're insinuating -- specific to a lifted vehicle.

9 BY MS. CANNELLA:

10 Q I'm sorry?

11 A Specific to a lifted vehicle.

12 Q One of the things that you testified about
13 earlier was that Rough Country doesn't know of
14 incidents where its lifts have caused injury in real
15 road crashes. Correct? Is that a fair paraphrase?

16 A I'm not saying that there hasn't been
17 wrecks with lifts where injuries were caused.
18 That's not what I'm saying. I don't know that the
19 injuries that were sustained in any event involving
20 a Rough Country lift caused those injuries to be any
21 more severe.

22 Q Okay. Correct me if I'm wrong, but I
23 thought earlier today you testified that Rough
24 Country considers the fact that its customers have
25 not complained about injuries being caused by lifts;